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4 *Attorney for Plaintiff*
JENNY SHAO

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

10 JENNY SHAO,

11 Plaintiff,

12 vs.

13 URBAN ALCHEMY, *et al.*,

14 Defendants.

Case No. 3:23-cv-6300-CRB

**JOINT STIPULATION AND [PROPOSED]
ORDER CHANGING TIME OF CASE
MANAGEMENT CONFERENCE AND
CHANGING DEFENDANT ROBERT
MOORE'S TIME TO RESPOND TO FIRST
AMENDED COMPLAINT**

Civil L.R. 6-1; 6-2

Conference Date: March 22, 2024

Time: 8:30 a.m.

Place: Phillip Burton Federal Building

450 Golden Gate Avenue

San Francisco, CA 94102

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WHEREAS, on December 8, 2023, Plaintiff JENNY SHAO initiated the above-captioned Action by filing a Complaint for Damages and Injunctive Relief for Violations of Civil Rights (ECF 1);

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WHEREAS, on December 11, 2023, this Case was assigned to Magistrate Judge Thomas S. Hixson (ECF 3) and an Initial Case Management Conference was scheduled for March 7, 2024 (ECF 4);

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WHEREAS, on January 17, 2024, before any Defendant was served, Plaintiff filed a First Amended Complaint for Damages and Injunctive Relief for Violations of Civil Rights (ECF 10) ("FAC");

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WHEREAS, on February 8, 2024, Plaintiff and Defendant CITY AND COUNTY OF SAN FRANCISCO entered into a Stipulation Extending Time to Respond to Complaint (ECF 13) extending

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1 said Defendant's deadline to respond to the FAC to March 1, 2024;
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3 WHEREAS, on February 15, 2024, Plaintiff and Defendant URBAN ALCHEMY entered into a
4 Stipulation Extending Time to Respond to Complaint (ECF 17) extending said Defendant's deadline to
5 respond to the FAC to March 4, 2024;

6 WHEREAS, on February 23, 2024, the Court entered an Order Reassigning Case (ECF 26)
7 reassigning this Case from Magistrate Judge Thomas S. Hixson to Senior District Judge Charles R.
8 Breyer for all further proceedings, and vacating all hearing dates;

9 WHEREAS, on February 23, 2024, an Initial Case Management Conference was set for
10 March 22, 2024 (ECF 27);

11 WHEREAS, on March 1, 2024, Plaintiff and Defendants URBAN ALCHEMY, CITY AND
12 COUNTY OF SAN FRANCISCO, ANDREW Q. JUAREZ and RUBEN A. ROMERO entered into a
13 Stipulation Extending Time to Respond to Complaint (ECF 28) extending said Defendants' respective
14 deadlines to respond to the FAC to April 9, 2024;

15 WHEREAS, on March 6, 2024, Defendant ROBERT MOORE filed a Waiver of Service
16 (ECF 32), which waiver extends the deadline for Defendant ROBERT MOORE to respond to the FAC
17 until May 5, 2024;

18 WHEREAS, per the request of Plaintiff, and to accommodate the other parties and the timely
19 prosecution of this matter, Defendant ROBERT MOORE has agreed to a shortened time period for his
20 response, until April 19, 2024, but no sooner than this date.

21 WHEREAS, Plaintiff represents that Defendant MID-MARKET FOUNDATION¹ has very
22 recently retained legal counsel and that Plaintiff and said Defendant have agreed to an extension of time
23 for said Defendant to evaluate the Case and respond to the FAC, which agreement Plaintiff expects to be
24 reflected in a separate stipulation to be filed with the Court promptly hereafter;

25 WHEREAS, at least one Defendant is contemplating filing a Motion to Dismiss, the Court's
26 decision upon which could affect the scope of the Case and, as such, could also affect the scope of
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28 ¹ Plaintiff represents that although Defendant Mid-Market Foundation is not a party to this Stipulation,
said Defendant's newly-retained legal counsel has informed Plaintiff's counsel that Mid-Market
Foundation has no objection to the relief sought herein.

1 discovery and trial as well as the time needed for the pre-trial and trial deadlines;
2

3 IT IS HEREBY STIPULATED that Defendant ROBERT MOORE's deadline to respond to the
4 FAC is changed to April 19, 2024; and

5 IT IS FURTHER STIPULATED that the date of the Initial Case Management Conference should
6 be changed from March 22, 2024 to June 7, 2024 (with related deadlines adjusted accordingly).

7 Stipulated by Plaintiff JENNY SHAO:

8 Dated: March 8, 2024

9 By: /s/ Donald Cloyce Wagda
10 DONALD CLOYCE WAGDA (Cal. Bar No. 257254)
11 380 Hamilton Avenue #72
Palo Alto, California 94301
Telephone: (650) 644-7151
donald@WagdaLaw.com

12 *Attorney for Plaintiff*
13 JENNY SHAO

14 Stipulated by Defendant URBAN ALCHEMY:

15 Dated: March 8, 2024

16 By: /s/ Kere K. Tickner
17 KERE K. TICKNER (Cal. Bar No. 174777)
18 McGlinchey Stafford PLLC
19 18201 Von Karman Avenue Suite 350
Irvine, California 92612
Telephone: (949) 381-5925
Facsimile: (949) 271-4040
Email: ktickner@mcglinchey.com

21 *Attorneys for Defendant*
22 URBAN ALCHEMY

1 Stipulated by Defendants CITY AND COUNTY OF SAN FRANCISCO, ANDREW Q JUAREZ
2 AND RUBEN A. ROMERO:

3 Dated: March 8, 2024
4

5 By: /s/ Katherine B. Bearman
6 KATHERINE B. BEARMAN

7 DAVID CHIU, State Bar #189542
8 City Attorney
9 JAMES F. HANNAWALT, State Bar #139657
10 Acting Chief Trial Deputy
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21 *Attorneys for Defendants*
22 CITY AND COUNTY OF SAN FRANCISCO
23 ANDREW Q. JUAREZ
24 RUBEN A. ROMERO

25 Stipulated by Defendant ROBERT MOORE:
26

27 Dated: March 8, 2024
28

29 By: /s/ Larry A. Helfman, Esq.
30 LARRY A. HELFMAN, ESQ., State Bar no. 146523
31 FRIEDENTHAL, HEFFERNAN & BROWN, LLP
32 1520 W. Colorado Boulevard, Second Floor
33 Pasadena, California 91105
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FILER'S ATTESTATION

2 Pursuant to Civil L.R. 5-1(i)(3), I, Donald Wagda, declare under penalty of perjury under the laws
3 of the State of California that each of the other signatories hereto has concurred in the filing of this
4 document.

5 Dated: March 8, 2024

6 */s/ Donald Cloyce Wagda*
7 DONALD CLOYCE WAGDA

8 *Attorney for Plaintiff*
9 JENNY SHAO

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11 **[PROPOSED] ORDER**

12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13 A Joint Case Management Statement due by May 31, 2024. Case Management Conference set for
14 June 7, 2024 at 8:30 a.m.

15 Dated: March 13, 2024

16 
17 HON. CHARLES R. BREYER
18 United States Senior District Judge

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